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January 11, 2012

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Closed Captioning of Internet Protocol-Delivered Video Programming;  
Implementation of the Twenty-First Century Communications and Video  
Accessibility Act of 2010 (CVAA), MB Docket No. 11-154**

Dear Ms. Dortch:

On January 10, 2012, I spoke by telephone with Erin McGrath, Legal Advisor to Commissioner McDowell, regarding Verizon's position on two issues raised in the above-referenced proceeding. First, I expressed our opposition to any regulation that would require set-top boxes to include a digital output that can pass through closed captioning data which would subsequently be rendered by a display device, such as a television monitor. Captions are currently rendered in the set-top box and then displayed on the television set. A technology mandate requiring the rendering of captions by the television monitor itself would require protocol and software changes on both set-top boxes and television sets. Second, with respect to archival Internet content, I requested that the FCC allow sufficient time for video programming distributors (VPDs) to pass through closed captions after being notified by a video programming owner (VPO) that captioning is required. Specifically, I asked the FCC to give VPDs at least 30 days to pass through captioning on archival Internet content after receiving notice from a VPO.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leora Hochstein".

cc: Erin McGrath